

From: Alfred Falzone
To: John Markham
Cc: Elisa McPhee
Subject: RE: Inventory Update
Date: Wednesday, May 8, 2024 2:57:50 PM
Attachments: [inky-injection-inliner-209b06d63f3139b7bbda7129634c80da.png](#)
[inky-injection-inliner-03755809cc10337ec572b1f12a6beedf.png](#)



Caution: External (afalzone@eatonpeabody.com)



Misleading Link

John,

The inventory has been in progress since March 4, 2024, and is now, at most, about a month away from completion. Although I estimated a May 1 completion date in my March 19, 2024, email to you, it has taken a bit longer than that.

As you know, the Order specifies that the Estate is responsible for all of the costs related to the transfer and storage of the art, as well as the retention of the of the appraiser. In order to retain an appraiser, the inventory was necessary to give potential appraisers a scope of work. Consequently, the Estate has paid the costs to conduct the inventory. Unless I have missed it, the Order does not provide that Mike has any role to play in the transfer, storage, or appraisal process.

Even if UOVO agreed to do the inventory again with Mike present, this would require an unnecessary duplication of time and resources, with no tangible benefit to the parties. Additionally, juggling the schedules of the folks doing the inventory as well as Mike's schedule would be inefficient and delay the process even further.

We will absolutely share the inventory with Mike as soon as it is complete, and simultaneously provide an update on the efforts to retain the appraiser.

Best,
 Alfred

Alfred J. F. Morrow III
 207-274-5266 | Eaton Peabody

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From: John Markham <jmarkham@markhamreadzerner.com>

Sent: Tuesday, May 7, 2024 4:46 PM

To: Alfred Falzone <AFalzone@eatonpeabody.com>

Subject: Re: Inventory Update

Alfred

But Mike wanted to be present for the inventory.

Can we do another one with the New York art and then the Rosenbaum art at the end of the month. When was the inventory commenced?

John Markham

On May 7, 2024, at 3:21 PM, Alfred Falzone <AFalzone@eatonpeabody.com> wrote:

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 Misleading Link

<inky-injection-inliner-209b06d63f3139b7bbda7129634c80da.png>

John,

I wanted to follow up with an update on the inventory and appraisal process.

Riding on the wave of a productive three-week stretch, where they averaged almost 600 objects a week, the team members who are conducting the inventory process are now expecting to finish up the New York inventory this week. There will be no downtime before they start on the works from the Rosenbaum Gallery, with the first batch of that group cycling into the inventory process later this week. It appears that the Florida collection is significantly smaller than the New York inventory.

All said, they are targeting the first week of June for inventory completion. Additionally, they are in the process of securing the services of an appraiser; as we previously discussed, they needed to size the scope of work and total number of pieces in order for that effort to begin in earnest.

Thank you very much for your patience; I know that we are all motivated to bring this process to as swift a conclusion as possible.

Best regards,
Alfred

Alfred J. F. Morrow III
207-274-5266 | Eaton Peabody

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From: John Markham <jmarkham@markhamreadzerner.com>
Sent: Tuesday, May 7, 2024 9:38 AM
To: Alfred Falzone <AFalzone@eatonpeabody.com>; Bridget Zerner <bzerner@markhamreadzerner.com>
Cc: Elisa McPhee <EMcPhee@eatonpeabody.com>
Subject: RE: Missed Call

Alfred:

Thanks for checking on this and, again, my client is very anxious to have a long overdue joint inventory as was promised by UOVO five or six month ago. Let's set an inventory date or (hopefully not) a court status date. I am standing by.

John
John J. E. Markham, II
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From: Alfred Falzone <afalzone@eatonpeabody.com>
Sent: Tuesday, May 7, 2024 9:13 AM
To: John Markham <jmarkham@markhamreadzerner.com>; Bridget Zerner <bzerner@markhamreadzerner.com>
Cc: Elisa McPhee <EMcPhee@eatonpeabody.com>
Subject: Missed Call

<attachment-
1.png>

External (afalzone@eatonpeabody.com)

<attachment-
2.png>

John,

Sorry I missed you yesterday. Let me check in on the status and get back to you; I will do so ASAP.

Best,
Alfred

Alfred J. F. Morrow III (he/him) —

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